

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION

NO. 5:18-CR-00452-FL-1

UNITED STATES OF AMERICA)	
)	
v.)	DEFENDANT'S NOTICE
)	OF EXPERT WITNESSES
LEONID ISAAKOVICH TEYF)	

Defendant Leonid Isaakovich Teyf ("Mr. Teyf"), by and through his attorneys, hereby serves notice of his intention to offer, if necessary, the following expert testimony at trial in the above-referenced matter:

1) **Robert Wilson**, Forensic Accounting Expert. Mr. Wilson will testify as to the tracing analysis and other forensic techniques necessary to support the money laundering charges in this case. His testimony will apply specialized knowledge to the facts of this case, and will include an assessment as to the lack of any basis for tracing the applicable incoming wire transfers to the proceeds of any unlawful activity. Mr. Wilson will further testify about various legitimate uses of offshore companies and accounts, including but not limited to: reduction of financial risk given unreliable bank protections in certain countries; established banking expertise; confidentiality; and financial efficiency. Mr. Wilson will also rebut testimony offered at trial by the Government's expert, Drew Holiner, as appropriate.

2) **Gennady Esakov**, Russian Criminal Law Expert. Mr. Esakov will testify as to the necessary legal and factual bases for prosecuting the crimes, including bribery, under

Russian law testified to by Drew Holiner. Mr. Esakov will also testify in regard to the lack of any evidence of an investigation or criminal proceedings in Russia with respect to the relevant allegations against Mr. Teyf, and the consequences and impact of the lack of such evidence on the determination of whether the offense of bribery occurred under applicable Russian law. His testimony will apply specialized knowledge to the facts of this case. He will also rebut Mr. Holiner's expected testimony at trial, including, but not limited to, testimony that the alleged conduct of Mr. Teyf (if proven) would violate various identified provisions of the Russian Criminal Code.

3) **Isabelle Avrutin**, is a Russian linguist who will testify at trial as to the accuracy of certain translations designated by the Government. Her testimony will apply specialized knowledge to the facts of this case. Mr. Teyf serves notice of Ms. Avrutin's expert testimony in the same abundance of caution used by the Government in seeking to offer the testimony of its own Russian linguist.

To the extent any opinion testimony may be offered, it would also be admissible independently as a lay opinion under Federal Rule of Evidence 701.

Respectfully submitted, this the 5th day of February, 2020.

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CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of February, 2020, I electronically filed the foregoing **NOTICE OF EXPERT WITNESSES** with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

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